

Mr. David Rader  
Pfizer, Inc.  
PO Box 88  
Terre Haute, IN 47808

Re: Minor Source Modification No:  
**167-12293-00013**

Dear Mr. Rader:

Pfizer Inc. applied for a Part 70 operating permit on December 17, 1996 for a stationary pharmaceutical manufacturing operation. An application to modify the source was received on May 15, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. A 70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, with a maximum heat input capacity of 95.5 million BTU per hour when burning natural gas and 91.2 million BTU per hour when burning #2 fuel oil, utilizing low NOx burners for control and exhausting through stack 5.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Mr. Rob Harmon at (812) 462-3433, ext 14.

Sincerely,

George M. Needham  
Director  
Vigo County Air Pollution Control

Attachments  
RKH

cc: U.S. EPA, Region V  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Contract Management - Mindy Hahn  
IDEM-OAM - Winter Bottum

**PART 70 MINOR SOURCE MODIFICATION  
OFFICE OF AIR MANAGEMENT  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**Pfizer Inc.  
100 Pfizer Drive  
Terre Haute, Indiana 47802**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 167-12293-00013	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary pharmaceutical manufacturing operation.

Responsible Official:	Ed Gray
Source Address:	100 Pfizer Drive, Terre Haute, Indiana
Mailing Address:	PO Box 88, Terre Haute, Indiana 47808
Phone Number:	(812) 299-2121, ext 551 (Mr. David Rader, plant contact)
SIC Code:	2833
County Location:	Vigo County
County Status:	Maintenance attainment for sulfur dioxide Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules;

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

1. A 70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, with a maximum heat input capacity of 95.5 million BTU per hour when burning natural gas and 91.2 million BTU per hour when burning #2 fuel oil, utilizing low NOx burners for control and exhausting through stack 5.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Local Agency Requirement**

This permit shall also be considered to be the local permit, a separate application and approval is not required.

### **B.6      NSPS Reporting Requirement**

Pursuant to the New Source Performance Standards (NSPS), Part 60.40a, Subpart Dc, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, IN 46206-6015

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM and VCAPC, upon request and shall be subject to review and approval by IDEM, OAM and VCAPC. IDEM, OAM and VCAPC, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM and VCAPC.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM and VCAPC, if the source submits to IDEM, OAM and VCAPC, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM and VCAPC upon request and shall be subject to review and approval by IDEM, OAM and VCAPC. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and VCAPC shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and VCAPC within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and VCAPC reserve the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM and VCAPC may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.10 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM and VCAPC, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (b) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

A 70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, with a maximum heat input capacity of 95.5 million BTU per hour when burning natural gas and 91.2 million BTU per hour when burning #2 fuel oil, utilizing low NOx burners for control and exhausting through stack 5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 particulate matter emissions from boiler Temp shall not exceed 0.216 pounds per million BTU. This limitation was determined as follows:

$$Pt = 1.09 / Q^{0.26} \quad \text{with:} \quad Pt = \begin{array}{l} \text{Pounds of particulate matter emitted per million BTU} \\ \text{heat input} \end{array}$$
$$Q = \begin{array}{l} \text{Total source maximum operating capacity rating in} \\ \text{million BTU per hour.} \end{array}$$

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.42c(d)]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO<sub>2</sub> emissions from the thirteen (13) MMBtu per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

#### D.1.3 Opacity Limitation [326 IAC 12-1] [40 CFR 60.43c(c)]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall not cause to be discharged into the atmosphere from this facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Pursuant to 40 CFR 60 Subpart Dc, the opacity standard applies at all times, except during periods of startup, shutdown, or malfunction.

#### D.1.4 Fuel Oil Use Limitation [326 IAC 2-7-10.5(d)(5)]

The fuel oil usage shall be limited to less than 390,860 gallons of #2 fuel oil per 12-consecutive month period, rolled monthly. This limitation keeps the potential emissions below 25 tons per year of NOx and SO<sub>2</sub> (in combination with Condition D.1.2 above).

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

## **Compliance Determination Requirements**

### **D.1.6 Sulfur Dioxide - Initial Performance Test [326 IAC 12-1] [40 CFR 60.44c(b) and (h)]**

Pursuant to 40 CFR 60, Subpart Dc, the first day of the initial performance test shall be scheduled within 30 days after the facility achieves the maximum production rate, but not more than 180 days after initial startup.

Pursuant to 40 CFR 60, Subpart Dc, where the Permittee seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1).

### **D.1.7 Opacity - Initial Performance Test [326 IAC 12-1] [40 CFR 60.45c(a)]**

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall conduct an initial performance test for opacity as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using Method 9 (6-minute average of 24 observations) for determining the opacity of stack emissions. Testing shall be conducted in accordance with Section C- Performance Testing.

### **D.1.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 12-1] [40 CFR 60.48c(f)]**

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification (as described in 40 CFR 60.48c(f)); or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.9 Visible Emissions Notations**

- (a) Visible emission notations of the Temp boiler stack exhaust shall be performed once per shift during normal daylight operations when combusting fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the boiler Temp stack exhaust once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### **D.1.11 NSPS Record Keeping Requirements [326 IAC 12-1] [40 CFR 60.48c]**

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Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain records of the amounts of each fuel combusted each day.

Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.

##### **D.1.12 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit,

or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The natural gas fired boiler certification shall be submitted quarterly to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### D.1.13 NSPS Reporting Requirements [326 IAC 12-1] [40 CFR 60.48c]

Pursuant to 40 CFR 60.48c(a) the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

- (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (b) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
- (c) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (d) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions. The Administrator will examine the description of the control device and determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

Pursuant to 40 CFR 60.48c(b) the Permittee shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS using the applicable performance specifications in Appendix B.

Pursuant to 40 CFR 60.48c(d) the Permittee shall submit quarterly reports to the Administrator. The initial quarterly report shall be postmarked by the 30<sup>th</sup> day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period.

Pursuant to 40 CFR 60.48c(e) the Permittee shall keep records and submit quarterly reports as required above, including the following information:

- (a) Calendar dates covered in the reporting period.
- (b) Each 30-day average SO<sub>2</sub> emission rate (ng/J or lb/million BTU), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (c) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of this section, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Pfizer, Inc.  
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802  
Mailing Address: PO Box 88, Terre Haute, Indiana 47808  
Source Modification No.: 167-12293-00013

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**Part 70 Source Modification Quarterly Report**

Source Name: Pfizer, Inc.  
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802  
Mailing Address: PO Box 88, Terre Haute, Indiana 47808  
Source Modification No.: 167-12293-00013  
Facility: Boiler Temp  
Parameter: Fuel Oil Use Limitation  
Limit: 390,860 gallons per 12-consecutive month period, rolled monthly

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Gallons of #2 Fuel Oil This Month	Gallons of #2 Fuel Oil Previous 11 Months	Gallons of #2 Fuel Oil 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Pfizer Inc.  
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802  
Mailing Address: PO Box 88, Terre Haute, Indiana 47808  
Source Modification No.: 167-12293-00013

**This certification shall be included when submitting monitoring, testing  
reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From To


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management  
Office of Air Management  
and  
Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a  
Part 70 Minor Source Modification.**

**Source Background and Description**

<b>Source Name:</b>	<b>Pfizer Inc.</b>
<b>Source Location:</b>	<b>100 Pfizer Drive, Terre Haute, Indiana 47802</b>
<b>County:</b>	<b>Vigo County</b>
<b>SIC Code:</b>	<b>2833</b>
<b>Operation Permit No.:</b>	<b>T167-7586-00013</b>
<b>Operation Permit Issuance Date:</b>	<b>Not yet issued</b>
<b>Significant Source Modification No.:</b>	<b>167-12293-00013</b>
<b>Permit Reviewer:</b>	<b>Rob Harmon - VCAPC</b>

Vigo County Air Pollution Control (VCAPC) has reviewed a modification application from Pfizer Inc. relating to the construction of the following emission units and pollution control devices:

1. A 70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, with a maximum heat input capacity of 95.5 million BTU per hour when burning natural gas and 91.2 million BTU per hour when burning #2 fuel oil, utilizing low NOx burners for control and exhausting through stack 5.

**History**

On May 15, 2000, Pfizer Inc. submitted an application to VCAPC requesting to add the boiler identified as Temp to their existing plant. At the same time Pfizer Inc. requested an interim permit to begin construction on this boiler. The interim approval was granted on June 2, 2000 following the procedures for minor source modification approvals. Additionally, on June 2, 2000 Pfizer submitted an application for a new Animal Health Research Center. This application was not combined into this review for the following reasons: First, Pfizer contends that EPA has long held that for purposes of Title V permitting emissions from "research and development" facilities that are co-located with manufacturing operations should be considered separate sources. The boiler application relates to manufacturing operations and the Animal Health application is for a research facility. Second, Pfizer contends that the projects have vastly different origins. Central Research has done all the planning for the Research Center. The operations staff at the local Pfizer plant found the problems with the existing boilers and pushed for a solution. The development of a solution was led locally. For those 2 reasons it was determined that the 2 applications could be processed independently and not be considered PSD circumvention. Pfizer Inc. submitted a Part 70 permit application on December 17, 1996, but it has not yet been issued.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
5	Boiler Temp	19.5	4	27,639	666

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 15, 2000. Additional information was received on May 25, 2000 and June 2, 2000.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1 through 3).

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls or limitations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	5.7
PM-10	9.4
SO <sub>2</sub>	202.6
VOC	2.3
CO	35.1
NO <sub>x</sub>	57.1

## Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5) for modifications with potential to emit limited to less than 25 tons per year for any single criteria pollutant.

## County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Vigo County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	greater than 100
PM-10	greater than 100
SO <sub>2</sub>	greater than 250
VOC	less than 100
CO	greater than 100
NOx	greater than 250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the existing Part 70 application.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	NOx	VOC	CO	HAPs
Temp Boiler	1.1	3.6	14.1	23.4	2.3	35.1	
PSD Sig Level	25	15	40	40	40	100	
Significant ?	N	N	N	N	N	N	

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the

PSD requirements do not apply.

- (a) The SO<sub>2</sub> and NO<sub>x</sub> emissions are limited to less than 40 tons/yr, therefore, PSD requirements do not apply. This limit is equivalent to no more than 390,860 gallons per 12 consecutive month period, rolled monthly of #2 fuel oil fired in the Boiler Temp. The detailed calculation of this limitation is presented in Appendix A page 3.

### **Federal Rule Applicability**

- (a) The Boiler Temp is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc).

#### *Pursuant to 40 CFR 60.42c(d) (Standard for sulfur dioxide)*

No owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/million BTU) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

#### *Pursuant to 40 CFR 60.42c(h) (Standard for sulfur dioxide)*

For affected facilities firing distillate oil and having heat input capacities between 10 and 100 million BTU per hour, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier as described under 40 CFR 60.48c(f)(1).

#### *Pursuant to 40 CFR 60.42c(i) (Standard for sulfur dioxide)*

The SO<sub>2</sub> emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

#### *Pursuant to 40 CFR 60.43c(c) (Standard for particulate matter)*

No owner or operator of an affected facility that combusts oil and has a heat input capacity of 8.7 MW (30 million BTU/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

#### *Pursuant to 40 CFR 60.43c(d) (Standard for particulate matter)*

The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown or malfunction.

#### *Pursuant to 40 CFR 60.44c(b) (Compliance and performance test methods and procedures for sulfur dioxide)*

The first day of the initial performance test shall be scheduled within 30 days after the facility achieves the maximum production rate, but not more than 180 days after initial startup.

#### *Pursuant to 40 CFR 60.44c(h) (Compliance and performance test methods and procedures for sulfur dioxide)*

For affected facilities subject to 40 CFR 60.42c(h)(1) where the owner or operator seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as

described under 40 CFR 60.48c(f)(1).

*Pursuant to 40 CFR 60.45c(a) (Compliance and performance test methods and procedures for particulate matter)*

The owner or operator of an affected facility subject to the opacity standards shall conduct an initial performance test as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods. 40 CFR 60.45c(a)(7) Method 9 (6-minute average of 24 observations) shall be used for determining the opacity of stack emissions.

*Pursuant to 40 CFR 60.46c(e) (Emission monitoring for sulfur dioxide)*

The monitoring requirements of paragraphs (a) and (d) of this section do not apply to affected facilities subject to 40 CFR 60.42c(h)(1) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, as described under 40 CFR 60.48c(f)(1).

*Pursuant to 40 CFR 60.48c(a) (Reporting and recordkeeping requirements)*

The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (4) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions. The Administrator will examine the description of the control device and determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

*Pursuant to 40 CFR 60.48c(b) (Reporting and recordkeeping requirements)*

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits of 40 CFR 60.42c, or the PM or opacity limits of 40 CFR 60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS using the applicable performance specifications in Appendix B.

*Pursuant to 40 CFR 60.48c(d) (Reporting and recordkeeping requirements)*

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits, fuel oil sulfur limits, or percent reduction requirements under 40 CFR 60.42c shall submit quarterly reports to the Administrator. The initial quarterly report shall be postmarked by the 30<sup>th</sup> day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period.



*Pursuant to 40 CFR 60.48c(e) (Reporting and recordkeeping requirements)*

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits, fuel oil sulfur limits, or percent reduction requirements under 40 CFR 60.43c shall keep records and submit quarterly reports as required above, including the following information:

1. Calendar dates covered in the reporting period.
2. Each 30-day average SO<sub>2</sub> emission rate (ng/J or lb/million BTU), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
3. If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of this section, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

*Pursuant to 40 CFR 60.48c(f) (Reporting and recordkeeping requirements)*

Fuel supplier certification shall include the following information: (for distillate oil)

1. The name of the oil supplier; and
2. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.

*Pursuant to 40 CFR 60.48c(g) (Reporting and recordkeeping requirements)*

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted each day.

*Pursuant to 40 CFR 60.48c(i) (Reporting and recordkeeping requirements)*

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

**State Rule Applicability - Individual Facilities**

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

Pursuant to 326 IAC 6-2-4 particulate matter emissions from boiler Temp shall not exceed 0.216 pounds per million BTU. This limitation was determined as follows:

$Pt = 1.09 / Q^{0.26}$	with:	$Pt =$	Pounds of particulate matter emitted per million BTU heat input
		$Q =$	Total source maximum operating capacity rating in million BTU per hour. This was determined to be 501.75 million BTU per hour by adding the existing units with all currently proposed units. Those are Boiler #5 (87 MMBTU/Hr), Boiler #6 (70 MMBTU/Hr), Boiler #7 (70 MMBTU/Hr), Boiler #8 (150 MMBTU/Hr), Temp (95.5 MMBTU/Hr), B-1 (14.625 MMBTU/Hr) and B-2 (14.625 MMBTU/Hr).

A comparison of the allowed emission rate as determined above to the estimated emission rate that is presented in Appendix A indicates that boiler Temp should be able to comply with this limitation.

**326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)**

Pursuant to 326 IAC 7-1.1-2 sulfur dioxide emissions from combustion of fuel oil shall not exceed five tenths (0.5) pound per million BTU. This also corresponds with the NSPS sulfur dioxide limitation.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM and VCAPC, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 167-12293-00013.

**Pfizer Inc.**  
**100 Pfizer Dr., Terre Haute, Indiana 47802**  
**167-12293-00013**

**Reviewer: Rob Harmon - VCAPC**  
**Date Received: May 15, 2000**

**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Unit ID: Temp (70,000 pounds of steam per hour)**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

95.5

836.6

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.8	3.2	0.3	20.9	2.3	35.1

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).



**Pfizer Inc.**  
**100 Pfizer Dr., Terre Haute, Indiana 47802**  
**167-12293-00013**  
**Reviewer: Rob Harmon - VCAPC**  
**Date Received: May 15, 2000**

**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**

**#1 and #2 Fuel Oil**

**Unit ID: Temp (70,000 pounds of steam per hour)**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <div style="border: 1px solid black; padding: 2px; text-align: center;">0.5</div>
<div style="border: 1px solid black; padding: 2px; text-align: center;">91.2</div>	5706.5142857	

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	2.0	3.3	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	5.7	9.4	202.6	57.1	1.0	14.3

### Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).



**Pfizer Inc.**  
**100 Pfizer Dr., Terre Haute, Indiana 47802**  
**167-12293-00013**

**Reviewer: Rob Harmon - VCAPC**  
**Date Received: May 15, 2000**

**Unit ID: Temp (70,000 pounds of steam per hour)**  
**Limited to 25 days of burning #2 Fuel Oil**  
**with the balance of the year utilizing Natural Gas**

25 days of operating time for the Temp Boiler utilizing #2 fuel oil which is  
600 hours of operation utilizing #2 fuel oil leaving 8160 hours of operation utilizing natural gas

Natural Gas Heat Input Capacity MMBtu/hr	Natural Gas Potential Throughput MMCF/yr	#2 Fuel Oil Heat Input Capacity MMBtu/hr			#2 Fuel Oil Potential Throughput kgals/year		
95.5	779.3	91.2			390.86		
		Pollutant					
		PM*	PM10*	SO2	NOx	VOC**	CO**
<i>Natural Gas Combustion</i>							
Emission Factor in lb/MMCF	1.9	7.6	0.6	50.0	5.5	84.0	
Potential Emission in tons/yr	0.7	3.0	0.2	19.5	2.3	35.1	
<i>#2 Fuel Oil Combustion</i>							
Emission Factor in lb/kgal	2.0	3.3	71.0	20.0	0.3	5.0	
Potential Emission in tons/yr	0.4	0.6	13.9	3.9	0	0	
<i>Total Potential Emission in tons/yr</i>	1.1	3.6	14.1	23.4	2.3	35.1	
PSD Significant Level	25	15	40	40	40	100	

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*The emission rates for VOC and CO are highest for natural gas only, therefore they are being directly transferred in from before

### Methodology

The same Methodology is being utilized as before with the exception of the amount of fuel being burned. That is being set at the daily limit for #2 fuel oil, with the rest of the year being on natural gas.







